

EXHIBIT A

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Attorneys for Plaintiff
Teva Pharmaceuticals USA, Inc.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

TEVA PHARMACEUTICALS USA, INC.,

Plaintiff,

v.

CORCEPT THERAPEUTICS, INC., AND
OPTIME CARE INC.,

Defendants.

Case No: 5:24-cv-03567-NW

**PLAINTIFF TEVA
PHARMACEUTICALS USA, INC.'S
RESPONSES AND OBJECTIONS TO
DEFENDANT CORCEPT
THERAPEUTICS, INC.'S SECOND SET
OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

REQUEST NO. 85:

All Documents and Communications related to disciplinary review letters that You received from the FDA concerning Your Generic Korlym, including (without limitation): (1) copies of the letters that You received; (2) Your responses (including any attachments) to the FDA’s letters; and (3) Your review, analysis, evaluation, and/or discussion of those letters, Your responses, and how they impacted Your ability to launch Generic Korlym prior to January 2024.

RESPONSE TO REQUEST NO. 85:

In addition to Teva’s General Objections, Teva further objects to this Request as overly broad and unduly burdensome to the extent it seeks information “without limitation.”

Without waiving Teva’s objections, Teva will perform a reasonable search for and produce non-privileged documents responsive to this Request from January 1, 2015 to present.

REQUEST NO. 86:

All Documents and Communications relating to Your “Pivot to Growth” strategy, including but not limited to the inclusion or exclusion of Your Generic Korlym from that strategy.

RESPONSE TO REQUEST NO. 86:

In addition to Teva’s General Objections, Teva further objects to this Request to the extent it is overly broad and unduly burdensome, and to the extent it seeks information that is unrelated to Generic Korlym and is therefore not reasonably calculated to lead to the discovery of admissible evidence.

Teva will not produce any documents in response to this Request until the parties have conferred and agreed on the scope and relevance of documents to be produced.

REQUEST NO. 87:

All Documents and Communications relating to Your 2023 plan to scale back Your manufacturing and sale of generic drugs. See, e.g., <https://www.bloomberg.com/news/articles/2023-05-18/teva-plans-cuts-to-generic-drug-production-amid-shortages?sref=XGjS8839>.

RESPONSE TO REQUEST NO. 87:

In addition to Teva's General Objections, Teva further objects to this Request because the phrase "plan to scale back" is vague and ambiguous. Teva further objects to this Request to the extent it is overly broad and unduly burdensome, and to the extent it seeks information that is unrelated to Generic Korlym and is therefore not reasonably calculated to lead to the discovery of admissible evidence.

Teva will not produce any documents in response to this Request until the parties have conferred and agreed on the scope and relevance of documents to be produced.

REQUEST NO. 88:

All Documents and Communications relating the January 2025 statements of Your Chief Executive Officer—Richard Francis—that: (1) "We're victims of our own success"; and (2) "We've had a great run, but now we're facing headwinds." *See, e.g.*, <https://www.ainvest.com/news/teva-stock-dives-14-we-re-victims-of-our-own-success-says-ceo-250110101706c3d1d07b40cd/>.

RESPONSE TO REQUEST NO. 88:

In addition to Teva's General Objections, Teva further objects to this Request because the phrase "relating the January 2025 statements" is vague and ambiguous. Teva further objects to this Request to the extent it is overly broad and unduly burdensome, and to the extent it seeks information that is unrelated to Generic Korlym and is therefore not reasonably calculated to lead to the discovery of admissible evidence.

Teva will not produce any documents in response to this Request until the parties have conferred and agreed on the scope and relevance of documents to be produced.

REQUEST NO. 89:

Documents sufficient to show copies of Your distribution agreements and drug-specific addenda with respect to each of Your drugs available in the United States.

RESPONSE TO REQUEST NO. 89:

In addition to Teva's General Objections, Teva further objects to this Request to the extent it is overly broad and unduly burdensome, and to the extent it seeks information that is unrelated to Korlym and is therefore not reasonably calculated to lead to the discovery of admissible evidence.

Teva will not produce any documents in response to this Request until the parties have conferred and agreed on the scope and relevance of documents to be produced.

REQUEST NO. 90:

All Documents and Communications relating to the role (if any) launching Generic Korlym had in Your acquisition of Actavis Generics.

RESPONSE TO REQUEST NO. 90:

In addition to Teva's General Objections, Teva further objects to this Request to the extent it is overly broad and unduly burdensome, and to the extent it seeks information that is unrelated to Korlym and is therefore not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving Teva's objections, Teva is willing to produce responsive, non-privileged documents, that are located, if any, pursuant to reasonable, agreed-upon search parameters, including search terms and custodians, for the period from January 1, 2015 to present.

REQUEST NO. 91:

Documents sufficient to show copies of Your agreement(s) to acquire Actavis Generics, including but not limited to any asset purchase agreements.

RESPONSE TO REQUEST NO. 91:

In addition to Teva's General Objections, Teva further objects to this Request because Teva's agreement(s) to acquire Actavis Generics is not relevant to any claims or defenses, nor is it reasonably calculated to lead to the discovery of admissible evidence.

Teva will not produce any documents in response to this Request.